

EXHIBIT A  
PLAINTIFFS' WITNESS LIST

The following includes the identity of individuals who Plaintiffs believe may have discoverable information and the possible subjects of their knowledge. Plaintiffs reserve the right to amend this list if, during the course of discovery (which is continuing), they discover additional persons who may have knowledge of the facts in this lawsuit.

Plaintiffs cannot, at this time, identify all of the persons who they may call as a witness due in large part to the Defendants' conduct in discovery to date. In many instances, Defendants have been unwilling or unable to identify the persons associated with certain trader identification numbers. In addition, although Defendants are required to disclose all persons with knowledge of the facts of this case and have purported to name them all as custodians, Plaintiffs believe that there may be other persons with knowledge whom Plaintiffs are not yet aware of. Defendants' late production of documents has also hindered the identification of all persons with knowledge of the facts of this case because Plaintiffs have lost months of time of review. In addition, Defendants' refusal to permit Plaintiffs to take Rule 30(b)(6) depositions has likewise delayed the identification of witnesses.

Plaintiffs' witness list includes:

All witnesses named by any Defendants.

All custodians previously identified by any party (either plaintiffs or defendants) through discovery.

Exhibit A-1, which details the Plaintiffs and their knowledge regarding this case.

Exhibit A-2, which details those nonparties (including employees of TASER who should be contacted through TASER) who Plaintiffs believe have knowledge regarding this case and who may serve as witnesses.

Exhibit A-3, which details those individuals who are (or were) employed by the Defendants and/or who are or were Defendants' agents who have knowledge relating to this case and who Plaintiffs may call as witnesses in this action.